

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

VS.

CAUSE NO. 4:15-CR-0073

STEVEN HAYNES

DEFENDANT

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MOTION TO TRANSFER DEFENDANT

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COMES NOW David G. Hill, recently appointed counsel for Defendant Steven Haynes, and moves the Court for an order to transfer the Defendant to the Lafayette County Detention Center in Oxford, Mississippi for the purposes of trial preparation. In support of the same, Defendant shows as follows:

1. Steven Haynes is a defendant in a murder case that is cloaked as a drug case. The Defendant is facing punishment the equivalent of imprisonment for the remainder of his life.
2. The Defendant is currently housed at West Tennessee Detention Facility located in Mason, Tennessee, a for profit prison run by Corrections Corporation of America.
3. As this case goes forward, counsel, his staff and Defendant will need to spend large amounts of preparation time together.
4. Having the Defendant housed in Mason, Tennessee grossly inhibits counsel and client effectively and efficiently spending necessary defense preparation time together.
5. Because of the travel and wait time to see the Defendant, counsel is going to very quickly expend the statutory CJA fee allowance on this case, which is going to result in counsel making a fee claim grossly in excess of the allowance for this case. By way of illustration, counsel will show the following: On Wednesday, August 24, 2016, counsel and his paralegal went to see

Defendant Haynes. This was basically an introductory meeting, as counsel had only recently been appointed. Counsel left Oxford at 8:30 a.m., traveled the calculated route to get to the prison, waited in the security lines, saw the Defendant for not much more than an hour, and returned to Oxford at a quarter to four. A one hour meeting in Oxford, if the Defendant were detained in Oxford, took over 7 hours with the Defendant detained in Mason, Tennessee. A \$138.00 fee claim for a 1 hour conference if the Defendant were housed in Oxford will result in a fee claim for August 24, 2016, of approximately \$1,000.00 in view of time necessarily expended plus travel expenses.

Again, on September 12, 2016, Counsel travelled to the prison in Mason, Tennessee to see Mr. Haynes. The purpose of this visit was only to get Mr. Haynes' signature on an arraignment wavier to the 4<sup>th</sup> Superseding Indictment. Obtaining this signature will result in a CJA fee claim of 4.5 hours plus mileage.

6. Consequently, it is in the best interest of the Defendant, his counsel and of the Administrative Office of the Courts for the Defendant to be relocated from the for profit prison in Mason, Tennessee to the Lafayette County Detention Center in Oxford, Mississippi, so that Defendant and his counsel can have appropriate access and availability to each other.

WHEREFORE, PREMISES CONSIDERED, Defendant Steven Haynes moves to relocate him from the West Tennessee Detention Facility and move him to the Lafayette County Detention Center where he may be more easily accessible to counsel for the preparation of his defense.

DATED this 13th day of September, 2016.

RESPECTFULLY SUBMITTED,

STEVEN HAYNES, Defendant

By: /s/David G. Hill.  
DAVID G. HILL, MS Bar No. 2444

CERTIFICATE OF SERVICE

I, DAVID G. HILL, counsel for Defendant Steven Haynes, do hereby certify I have served a true and correct copy of the above and foregoing document via the ECF system which sent a copy to the following as indicated:

Clyde McGee, AUSA  
[clyde.mcgee@usdoj.gov](mailto:clyde.mcgee@usdoj.gov)

Dated this 13th day of September, 2016.

/s/David G. Hill.  
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